

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE NIELSEN HOLDINGS PLC
SECURITIES LITIGATION

Civil Action No. 1:18-cv-07143-JMF

**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Public Employees' Retirement System of Mississippi ("MissPERS") and additionally named Plaintiff Monroe County Employees' Retirement System ("Monroe" and, together with MissPERS, "Plaintiffs"), on behalf of themselves and all other members of the proposed Settlement Class, through court-appointed Lead Counsel Labaton Sucharow LLP, hereby move this Court for an Order, pursuant to Federal Rules of Civil Procedure 23(a), (b)(3), and (e): (i) preliminarily approving the proposed Settlement of this securities class action; (ii) preliminarily certifying the Settlement Class for purposes of the Settlement only; (iii) approving the form and manner of providing notice of the proposed Settlement to the Settlement Class, including the procedures and deadlines for objecting, seeking exclusion from the Settlement Class, and submitting Claim Forms; (iv) scheduling a date for the final Settlement Hearing; (v) appointing Epiq Class Action & Claims Solutions as the Claims Administrator to administer the Settlement; and (vi) granting such other and further relief as the Court may deem fair and proper.

This motion is based on the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement and the Declaration of Christine M. Fox, dated March 15, 2022, with annexed exhibits, filed herewith.

A proposed Order Granting Preliminary Approval of Class Action Settlement, which was negotiated by the Parties to the Settlement, with annexed exhibits, is also submitted herewith.

Dated: March 15, 2022

Respectfully submitted,

LABATON SUCHAROW LLP

/s/ Christine M. Fox

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Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2022, I caused the foregoing Notice of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement to be served electronically through the Court's ECF system upon all ECF participants.

/s/ Christine M. Fox

CHRISTINE M. FOX